

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON

In re \_\_\_\_\_  
Debtor(s) ) Case No. \_\_\_\_\_  
              )  
              ) **Notice of Motion for Relief**  
              ) **from Automatic Stay in a**  
              ) **Chapter 11/12 Case,**  
              ) **and Notice of Hearing Thereon**

**YOU ARE NOTIFIED THAT:**

1. A motion was filed by \_\_\_\_\_ for relief from the automatic stay protecting the debtor(s) and debtor's property, as provided by 11 U.S.C. § 362.
2. The name and address of the moving party's attorney (or moving party, if no attorney) are:
3. If you wish to resist the motion you must, within 14 days of the service date shown below, file a written response with the clerk at 1050 SW 6th Ave. #700, Portland OR 97204 or 405 E 8th Ave. #2600, Eugene OR 97401. If the response is served in paper, you must also file a certificate showing the response has been served on the moving party's attorney.
4. A response must state the facts upon which relief from the automatic stay is resisted. See [Local Bankruptcy Form \(LBF\) 720.50, Procedures re: Relief from Stay](#), for details.
5. If you file a timely response, a hearing on the motion will be held as follows:

Date: \_\_\_\_\_

Time: \_\_\_\_\_

Location: Courtroom #\_\_\_\_\_, \_\_\_\_\_

Telephone Hearing [NOTE: See [LBF 888](#), Telephone Hearing Requirements]

Call-In Number: (888) 684-8852

Access Code: 5870400 for Judge David W. Hercher (dwh)

1238244 for Judge Peter C. McKittrick (pcm)

4950985 for Judge Teresa H. Pearson (thp)

3388495 for Judge Thomas M. Renn (tmr)

Other \_\_\_\_\_

No testimony will be taken at the hearing. If no timely response is filed, the hearing may be cancelled. Parties are encouraged to check the hearing calendar at <https://www.orb.uscourts.gov> after the response deadline has passed.

6. If a timely response is not filed, then either:

- a. The court may sign an order without further notice, submitted by the moving party, granting relief from the stay; or
- b. The stay will expire under the terms of 11 U.S.C. § 362(e).

I certify that on \_\_\_\_\_ (1) this notice, (2) [LBF 720.50](#) if this notice was served on paper, (3) [LBF 888](#) if this notice was served on paper and a telephone hearing will be held, and (4) the motion, were served pursuant to Federal Rule of Bankruptcy Procedure (FRBP) 4001 and FRBP 7004 on the debtor(s), U.S. Trustee, trustee, members of any committee appointed pursuant to 11 U.S.C. § 1102 or its authorized agent [or, if no committee, on all creditors included on the list filed pursuant to FRBP 1007(d)], and their respective attorneys.

---

\_\_\_\_\_  
Signature of Moving Party or Attorney

Eleanor A. DuBay, OSB No. 073755  
TOMASI SALYER MARTIN  
121 SW Morrison St, Suite 1850  
Portland, OR 97204  
[edubay@tomasilegal.com](mailto:edubay@tomasilegal.com)  
Phone: (503) 894-9900  
Attorneys for Tasha Teherani-Ami

UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re

15005 NW Cornell LLC; and  
Vahan M. Dinihanian, Jr.,

Debtors.

Bankruptcy Case Nos.:

19-31883-dwh11 (Lead Case)

19-31886-dwh-11

Jointly Administered Under  
Case No. 19-31883-dwh11

CREDITOR TASHA TEHERANI-AMI'S  
MOTION FOR RELIEF FROM STAY RE:  
SKYLINE PROPERTY

(237 NW Skyline Blvd., Portland, OR  
97210)

**I. INTRODUCTION**

1. Creditor Tasha Teherani-Ami ("Creditor"), by and through her attorneys, Tomasi Salyer Martin PC, pursuant to 11 U.S.C. § 362(d) and Bankruptcy Rules 4001(a) and 9014, moves the court for an order granting relief from the automatic stay to permit the Creditor to complete the non-judicial foreclosure sale and take possession of certain real property of debtor Vahan M. Dinihanian, Jr. ("Dinihanian").

Page 1 – CREDITOR TASHA TEHERANI-AMI'S MOTION FOR RELIEF FROM  
STAY RE: SKYLINE PROPERTY  
TEHERA-B1\00610550.000

**TOMASI SALYER MARTIN**  
121 SW Morrison Street, Suite 1850  
Portland, Oregon 97204  
Telephone: (503) 894-9900  
Facsimile: (971) 544-7236

2. This motion is supported by the declaration of Tasha Teherani-Ami ("Creditor Dec.") filed contemporaneously herewith and the records and files herein.

## **II. JURISDICTION**

3. The court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

## **III. FACTUAL BACKGROUND**

4. On or about August 22, 2012, Creditor (then known as Tasha L. Dinihanian) filed a petition for dissolution of her marriage to Dinihanian in the Multnomah County Circuit Court, Case No. 1208-68730 (the "Divorce Proceeding"). Creditor Dec., ¶ 3. After a protracted and contentious proceeding, Creditor and Dinihanian reached an agreement for the distribution of their assets. To implement their settlement, the parties executed and filed a stipulated General Judgment of Dissolution of Marriage (the "Judgment") which contained a \$2.25 million equalizing award in favor of Creditor and against Dinihanian. Stipulation of Undisputed Facts and Exhibits [Doc 250] ("Stipulated Facts"), ¶ 1, Ex. 1. The Judgment was entered on the court registry on March 22, 2016. *Id.*

5. The Judgment provides that the \$2.25 million money award was due and payable no later than four years from the date of mediation (January 6, 2015), which was January 6, 2019. *Id.*, Ex. 1, ¶ 13B. Further, no interest on the Judgment accrued during the first two years of the Judgment from April 6, 2015 through April 6, 2017, after which time interest began accruing at the rate of 4.50% per annum (\$277.40 per diem) until paid in full. *Id.* The Judgment further provides for recovery of attorney fees and costs in any action to enforce the terms of the Judgment. *Id.*, Ex. 1, ¶ 19. The Judgment allowed Dinihanian to pay the money award at any

time, but he has failed to do so and has failed to pay any of the interest accruing on the principal amount. *Id.*, Ex. 1, ¶ 13B.

6. In addition to the equalizing money award, the Judgment also provided for a variety of collateral to secure the Judgment in favor of Creditor and resolve other issues in the Divorce Proceeding. First, the Judgment was secured by two Deeds of Trust executed by Dinihanian and 15005 LLC, respectively, as grantor in favor of Creditor as beneficiary, as follows (*Id.*, Ex. 1, ¶ 13B(i)):

A. A Trust Deed, Security Agreement, Assignment of Leases and Rents, and Fixture Filing, executed by 15005 LLC as grantor, dated February 1, 2016, recorded February 8, 2016, as Recording No. 2016-008669, in the records of Washington County, Oregon, encumbering real property commonly known as 15005 NW Cornell Road, Beaverton, OR 97006 (the "Cornell Property"); and

B. A Residential Trust Deed executed by Dinihanian as grantor, dated February 1, 2016, recorded February 8, 2016, as Recording No. 2016-014522, in the records of Multnomah County, Oregon, encumbering certain real property commonly known as 237 NW Skyline Blvd., Portland, OR 97210 and legally described on Addendum A attached hereto (the "Skyline Property").

Stipulated Facts, ¶ 2, Exs. 2 and 3.

7. Second, the Judgment required that Dinihanian take certain steps to liquidate the Cornell Property in order to pay the Judgment and, should he fail to sell the Cornell Property, transfer one half of 15005 LLC's interest in the real property to the Sonja Dinihanian GST Trust DTS 1/1/11 (the "Trust"). Pursuant to paragraph 12 of the Judgment, 15005 LLC held as a tenant in common an undivided 50% interest in the Cornell Property, with the remaining 50% held by other limited liability companies controlled by Dinihanian's sister, Lillian Logan and her children. Stipulated Facts, ¶ 1, Ex. 1, p. 17. At the time the Judgment was entered, 15005 LLC was owned by Eagle Holdings, LLC and the Trust, each with a 50% ownership in 15005 LLC. It appears that Dinihanian owns 100% of Eagle Holdings, LLC. *See*

*generally, id.*

8. The Judgment requires that Dinihanian offer to sell the undivided 50% interest of 15005 LLC in the Cornell Property to the other owners. *Id.*, Ex. 1, ¶ 12B. In the event that offer was not accepted or completed, Dinihanian agreed to promptly "cause 15005 NW Cornell LLC to execute and deliver to" the Trust a statutory warranty deed conveying an undivided and unencumbered 25% interest in the Cornell Property in exchange for the Trust's 50% membership interest in 15005 LLC. *Id.* At the same time the statutory warranty deed was to be delivered to the Trust, Dinihanian agreed to sell his membership interest, or that of Eagle Holdings, LLC, in 15005 LLC or the remaining undivided 25% interest in the Cornell Property. *Id.* The Judgment provided that "[i]f necessary, [Dinihanian] shall initiate at his sole expense a suit to partition the Farm so that he can sell his interest." *Id.*, lines 10-12. Finally, the Judgment provided that Dinihanian would pay the equalizing money award to Creditor upon the sale of any direct or indirect interest in the Cornell Property. *Id.*, Ex. 1, ¶ 12(C). However, the Judgment specifically states that "sale of any interest in the Farm is not a condition precedent to [Dinihanian's] obligation to promptly make the payment" due to Creditor under the Judgment. *Id.*, Ex. 1, ¶ 13(B).

9. To date, Dinihanian has failed to take any of the steps required by the Judgment: (1) he failed to pay the Judgment when it became due and payable on January 6, 2019; (2) he failed to cause 15005 LLC to execute the statutory warranty deed to the Trust; and (3) he failed to divest himself of any ownership interest in 15005 LLC and/or the Cornell Property. Creditor Dec., ¶ 4; *see also*, Stipulated Facts, ¶¶ 5 and 6. Due to Dinihanian's failure to pay the Judgment when due, Creditor commenced a non-judicial foreclosure of the Skyline Property and a non-judicial foreclosure of the Cornell Property. Creditor Dec., ¶ 6; Stipulated

Facts, ¶ 9. The foreclosure sales were scheduled for June 20, 2019. Stipulated Facts, Ex. 14. In addition, due to Dinihanian's failure to comply with the terms of the Judgment related to the transfer to the Trust, Creditor commenced an enforcement action in the Divorce Proceeding to enforce the terms of the Judgment and a related contempt proceeding in Case No. 19CN01457, both of which actions were scheduled for hearing on May 22, 2019, the day after Dinihanian and 15005 LLC filed the voluntary petitions. *Id.*, ¶ 11, Exs. 16-18.

10. On May 21, 2019, each of the debtors initiated a bankruptcy case by filing a voluntary petition under Chapter 11 of the Bankruptcy Code. The court has entered orders for joint administration of the Chapter 11 cases under Case No. 19-31883-dwh11. The voluntary petitions were filed the day before the contempt hearing in the Divorce Proceeding and one month prior to the two foreclosure sales. *Id.*, ¶ 12.

11. Dinihanian asserts that the value of the Skyline Property is \$1,000,000.00. Schedule A/B, filed June 14, 2019 [Doc 29]. Schedule D lists additional creditors who have claims secured by the Skyline Property, including Bateman Seidel, Daniel C. Lorenz, and Multnomah County.

12. On July 25, 2019, Creditor filed a Proof of Claim in each bankruptcy case [Claim 3 in the 15005 LLC case; Claim 3 in the Dinihanian case]. As of the date the petitions were filed, Creditor was owed the total sum of \$2,507,311.19, plus interest which continues to accrue thereafter at the rate of 4.50% until paid in full, plus foreclosure costs, attorney's fees, and costs as permitted under the Judgment and two deeds of trust. *See also*, Creditor Dec., ¶ 7; Stipulated Facts, ¶ 13.

13. On September 29, 2021, the Court denied confirmation of the Debtors' Second Amended Joint Plan of Reorganization Dated July 22, 2021 for the reasons stated on the

record and the Court entered a Minute Order [Doc 465] documenting the denial of confirmation.

#### IV. MOTION

##### **A. Creditor is Entitled to Relief from the Automatic Stay to Complete the Non-Judicial Foreclosure of Certain Real Property of Dinihanian.**

14. Creditor requests relief from the automatic stay of § 362 in order to complete the non-judicial foreclosure of the Skyline Property because there is no equity in the Skyline Property and such property is not necessary for an effective reorganization. 11 U.S.C. § 362(d)(2) provides that a court shall grant relief from the automatic stay:

with respect to a stay of an act against property under subsection (a) of this section, if—

- (A) the debtor does not have an equity in such property; and
- (B) such property is not necessary to an effective reorganization ...

11 U.S.C. § 362(d)(2).

15. As set forth herein, Creditor has a valid and perfected secured claim against Dinihanian in the amount of \$2,507,311.19 (as of the date of filing), which claim is secured by the Skyline Property.

16. Pursuant to Dinihanian's schedules, the Skyline Property has a fair market value of \$1,000,000, is deteriorating in value, and is not being adequately maintained by Dinihanian. The Skyline Property is further encumbered by additional secured claims to other creditors of Dinihanian. Accordingly, Dinihanian has no equity in the Skyline Property.

17. Further, the Skyline Property is not necessary for an effective reorganization. Confirmation of the Debtors' Second Amended Joint Plan of Reorganization Dated July 22, 2021 was denied. Consequently, there is no plan of reorganization in this proceeding. Therefore, the Skyline Property is not necessary for Dinihanian's plan of reorganization.

18. Alternatively, Creditor seeks relief from the automatic stay pursuant to 11 U.S.C. § 362(d)(1) which provides that a court shall grant relief from the automatic stay "for cause, including the lack of adequate protection of an interest in property of such party in interest." "Because there is no clear definition of what constitutes 'cause,' discretionary relief from the stay must be determined on a case by case basis." *In re MacDonald*, 755 F.2d 715, 717 (9th Cir. 1985).

19. Cause exists to grant relief from the automatic stay to allow Creditor to proceed with the foreclosure of the Skyline Property. Such good cause includes that there is no proposed plan of reorganization and, therefore, there is no reasonable possibility of a successful reorganization within a reasonable time. *In re Plateau Energy, Inc.*, 2011 Bankr. LEXIS 4188, at \*8 (Bankr. D. Colo. Oct. 28, 2011) (internal citations omitted), citing *In re Timbers of Inwood Forest Assocs., Ltd.*, 484 U.S. 365, 108 S.Ct. 626, 98 L.Ed.2d 740 (1988). Indeed, it is questionable whether Dinihanian's bankruptcy proceeding can even be maintained at this point given that the Court has denied the Debtors' Second Amended Joint Plan of Reorganization  
Dated July 22, 2021.

20. These bankruptcy proceedings have been pending for an unreasonable and excessive 30 months (two and a half years) without confirmation of a plan and without any reorganization of the Debtors. It is simply inequitable to continue to require Creditor to wait indefinitely to enforce her Judgment (which was due in full in January 2019), while interest accrues thereon and she is not receiving any adequate payments, but also allowing Dinihanian to continue the exclusive use and enjoyment of the Skyline Property which he voluntarily gave as security for the Judgment. *See* Credit Dec., ¶ 7. Creditor will suffer irreparable damage and loss unless relief from the automatic stay is granted and Creditor is permitted to foreclose on and

obtain possession of the Skyline Property.

**B. The Stay Under FRBP 4001(a) Should be Waived.**

21. Cause exists for the waiver of the automatic 14-day stay effectiveness of the relief order under Bankruptcy Rule 4001(a)(3) because of the reasons set forth herein.

**V. CONCLUSION**

WHEREFORE, Creditor prays for the entry of an order granting relief from the automatic stay to permit the Creditor to complete the non-judicial foreclosure sale and take possession of certain real property of debtor Vahan M. Dinihanian, Jr. known as the Skyline Property.

Dated: November 18, 2021.

TOMASI SALYER MARTIN

By: /s/ Eleanor A. DuBay

Eleanor A. DuBay, OSB #073755

(503) 894-9900

[edubay@tomasilegal.com](mailto:edubay@tomasilegal.com)

Of Attorneys for Tasha Teherani-Ami

**EXHIBIT A**  
**Legal Description**

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF Multnomah, STATE OF OR, AND IS DESCRIBED AS FOLLOWS:

A tract of land in Section 36, Township 1 North Range 1 West of the Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

Beginning at a stake 13.78 chains west and 30 feet North of the Southeast corner of said Section 36; thence West parallel with the Base Line 12.88 chains to a stake; thence North 7.76 chains to a stake; thence East 12.88 chains to a stake; thence South 7.76 chains to a stake at the place of beginning; and easement over the following described property:

The North 20 feet of the following described property situated in the County of Multnomah and State of Oregon described as follows:

A tract of land in Section 36, Township 1 North, Range 1 West of the Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

Beginning at a point in the South line of said Section 36, North  $89^{\circ} 47' 15''$  West, 640.0 feet from the Southeast corner of said section; running thence North  $89^{\circ} 47' 15''$  West along the South line of said Section, 240.0 feet; thence North  $0^{\circ} 24' 30''$  East, parallel to the East line of said section, 576.3 feet; thence North  $88^{\circ} 31\frac{1}{2}'$  East, 100 feet; thence North  $69^{\circ} 15\frac{1}{2}'$  East, 155.85 feet; thence South  $45^{\circ} 53'$  East, 20.87 feet to a point in the center line of Greenleaf Avenue; thence along said center line South  $27^{\circ} 33'$  West, 73.10 feet; thence South  $3^{\circ} 10'$  East, 139.80 feet; thence South  $0^{\circ} 10'$  East 415.96 feet to the point of beginning.

EXHIBIT A

**TOMASI SALYER MARTIN**  
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Eleanor A. DuBay, OSB No. 073755  
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Phone: (503) 894-9900  
Attorneys for Tasha Teherani-Ami

UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re

15005 NW Cornell LLC; and  
Vahan M. Dinihanian, Jr.,

Debtors.

Bankruptcy Case Nos.:

19-31883-dwh11 (Lead Case)

19-31886-dwh-11

Jointly Administered Under  
Case No. 19-31883-dwh11

DECLARATION OF TASHA TEHERANI-AMI IN SUPPORT OF CREDITOR TASHA TEHERANI-AMI'S MOTION FOR RELIEF FROM STAY RE: SKYLINE PROPERTY

(237 NW Skyline Blvd., Portland, OR 97210)

I, Tasha Teherani-Ami, after being duly sworn, depose and say:

1. I am a creditor in the above-captioned actions and the ex-spouse of Vahan M. Dinihanian, Jr. ("Dinihanian"). I am familiar with the facts set forth in this Declaration, through personal knowledge and review of the records I have maintained. The exhibits to this Declaration, if any, are true and correct documents in my possession. The statements set forth in

Page 1 – DECLARATION OF TASHA TEHERANI-AMI IN SUPPORT OF CREDITOR TASHA TEHERANI-AMI'S MOTION FOR RELIEF FROM STAY RE: SKYLINE PROPERTY (237 NW Skyline Blvd., Portland, OR 97210)  
TEHERA-B1\00610757.000

**TOMASI SALYER MARTIN**  
121 SW Morrison Street, Suite 1850  
Portland, Oregon 97204  
Telephone: (503) 894-9900  
Facsimile: (971) 544-7236

this Declaration are true and correct to the best of my knowledge, information, and belief based on either personal knowledge or a review of the attached records.

2. I make this Declaration in support of my Motion for Relief from Stay Re: Skyline Property and I am competent to testify as to the contents.

3. I am the Petitioner in the Multnomah County Circuit Court Case No. 1208-68730 (the "Divorce Proceeding") that was filed on August 22, 2012.

4. To date, Dinihanian has failed to take the steps required by the Judgment, including failing to pay the Judgment when it became due and payable on January 6, 2019 and failing to cause 15005 LLC to execute the statutory warranty deed to the Sonja Dinihanian GST Trust DTS 1/1/11 (the "Trust").

5. I am the trustee of the Trust, which is for the benefit of my daughter, Sonja Dinihanian.

6. Due to my ex-husband's failure to pay the Judgment when due, I requested that the successor trustee under the two deeds of trust commence a non-judicial foreclosure of the Skyline Property and a non-judicial foreclosure of the Cornell Property. The foreclosure sales were scheduled for June 20, 2019.

7. To date, I have only received monthly adequate protection payments in accordance with the Stipulated Order Regarding Creditor Tasha Teherani-Ami's Motion for Relief from Stay Re: Cornell Property [Doc 397]. I received four monthly payments from June 1 to September 1, 2021 totaling \$34,120.20. I have not received any payment since September 1, 2021 and there remains approximately \$3,075,000 due on the Judgment.

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/ / /

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/ / /

I HEREBY DECLARE THAT THE ABOVE STATEMENTS ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND THAT IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

Dated: November 16, 2021.

By: /s/ Tasha Teherani-Ami

Tasha Teherani-Ami  
Portland, Oregon

Page 3 – DECLARATION OF TASHA TEHERANI-AMI IN SUPPORT OF CREDITOR TASHA TEHERANI-AMI'S MOTION FOR RELIEF FROM STAY RE: SKYLINE PROPERTY (237 NW Skyline Blvd., Portland, OR 97210)  
TEHERA-B1\00610757.000

***TOMASI SALYER MARTIN***  
121 SW Morrison Street, Suite 1850  
Portland, Oregon 97204  
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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON

In re	Bankruptcy Case Nos.:
15005 NW Cornell LLC; and Vahan M. Dinihanian, Jr.,	19-31883-dwh11 (Lead Case)
Debtors.	19-31886-dwh-11
	Jointly Administered Under Case No. 19-31883-dwh11
	[Proposed] ORDER GRANTING CREDITOR TASHA TEHERANI-AMI'S MOTION FOR RELIEF FROM STAY RE: SKYLINE PROPERTY
	(237 NW Skyline Blvd., Portland, OR 97210)

THIS MATTER came before the Court for hearing on the Motion of Creditor Tasha Teherani-Ami for Relief from Stay re: Skyline Property (237 NW Skyline Blvd., Portland, OR 97210) (the "Motion"). The Court having reviewed the Motion, hearing oral argument of the parties (if any), and being otherwise duly advised, now, therefore,

IT IS HEREBY ORDERED as follows:

Page 1 – [Proposed] ORDER GRANTING CREDITOR TASHA TEHERANI-AMI'S  
MOTION FOR RELIEF FROM STAY RE: SKYLINE PROPERTY  
(237 NW Skyline Blvd., Portland, OR 97210)  
TEHERA-B1\00610770.000

**TOMASI SALTER MARTIN**  
121 SW Morrison Street, Suite 1850  
Portland, Oregon 97204  
Telephone: (503) 894-9900  
Facsimile: (971) 544-7236

1. Creditor Tasha Teherani-Ami's Motion for Relief from Stay re: Skyline Property is GRANTED;

2. Creditor Tasha Teherani-Ami is granted relief from stay to foreclose on and obtain possession of the real property commonly known as 237 NW Skyline Blvd., Portland, OR 97210 and as more particularly described on Exhibit A attached hereto and incorporated herein (the "Skyline Property") to the extent permitted by nonbankruptcy law; and

5. The 14 day stay provided by Federal Rule of Bankruptcy Procedure 4001(a) shall be waived.

###

I certify that I have complied with the requirements of LBR 9021-1(a).

Presented By:

TOMASI SALYER MARTIN

By: /s/ Eleanor A. DuBay  
Eleanor A. DuBay, OSB #073755  
(503) 894-9900  
[edubay@tomasilegal.com](mailto:edubay@tomasilegal.com)  
Of Attorneys for Tasha Teherani-Ami

**EXHIBIT A**  
**Legal Description**

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF Multnomah, STATE OF OR, AND IS DESCRIBED AS FOLLOWS:

A tract of land in Section 36, Township 1 North Range 1 West of the Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

Beginning at a stake 13.78 chains west and 30 feet North of the Southeast corner of said Section 36; thence West parallel with the Base Line 12.88 chains to a stake; thence North 7.76 chains to a stake; thence East 12.88 chains to a stake; thence South 7.76 chains to a stake at the place of beginning; and easement over the following described property:

The North 20 feet of the following described property situated in the County of Multnomah and State of Oregon described as follows:

A tract of land in Section 36, Township 1 North, Range 1 West of the Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

Beginning at a point in the South line of said Section 36, North  $89^{\circ} 47' 15''$  West, 640.0 feet from the Southeast corner of said section; running thence North  $89^{\circ} 47' 15''$  West along the South line of said Section, 240.0 feet; thence North  $0^{\circ} 24' 30''$  East, parallel to the East line of said section, 576.3 feet; thence North  $88^{\circ} 31\frac{1}{2}'$  East, 100 feet; thence North  $69^{\circ} 15\frac{1}{2}'$  East, 155.85 feet; thence South  $45^{\circ} 53'$  East, 20.87 feet to a point in the center line of Greenleaf Avenue; thence along said center line South  $27^{\circ} 33'$  West, 73.10 feet; thence South  $3^{\circ} 10'$  East, 139.80 feet; thence South  $0^{\circ} 10'$  East 415.96 feet to the point of beginning.

## CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2021 I served a copy of the foregoing  
**CREDITOR TASHA TEHERANI-AMI'S MOTION FOR RELIEF FROM STAY RE:  
SKYLINE PROPERTY (237 NW Skyline Blvd., Portland, OR 97210); DECLARATION  
OF TASHA TEHERANI-AMI IN SUPPORT OF CREDITOR TASHA TEHERANI-  
AMI'S MOTION FOR RELIEF FROM STAY RE: SKYLINE PROPERTY (237 NW  
Skyline Blvd., Portland, OR 97210); and PROPOSED FORM OF ORDER** by electronic  
means using ECF to the parties listed below:

STEPHEN P ARNOT on behalf of U.S. Trustee US Trustee, Portland  
[steve.arnot@usdoj.gov](mailto:steve.arnot@usdoj.gov)

CHRISTOPHER N COYLE on behalf of Defendant Eagle Holdings LLC  
[chris@vbcattorneys.com](mailto:chris@vbcattorneys.com), [ecfmail@vbcattorneys.com](mailto:ecfmail@vbcattorneys.com)

JOSEPH A FIELD on behalf of Attorney Sortis Holdings, Inc.  
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RUSSELL D GARRETT on behalf of Creditor Alexander LLC  
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RUSSELL D GARRETT on behalf of Creditor Christiana LLC  
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RUSSELL D GARRETT on behalf of Creditor Cornell Rd LLC  
[russ.garrett@jordanramis.com](mailto:russ.garrett@jordanramis.com), [patricia.repp@jordanramis.com](mailto:patricia.repp@jordanramis.com); [litparalegal@jordanramis.com](mailto:litparalegal@jordanramis.com)

RUSSELL D GARRETT on behalf of Creditor Lillian Logan  
[russ.garrett@jordanramis.com](mailto:russ.garrett@jordanramis.com), [patricia.repp@jordanramis.com](mailto:patricia.repp@jordanramis.com); [litparalegal@jordanramis.com](mailto:litparalegal@jordanramis.com)

NICHOLAS J HENDERSON on behalf of Debtor 15005 NW Cornell LLC  
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